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**From:** LEE, LILY [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D6085A744F9347E6836C54C0E85B97B2-LLEE06]  
**Sent:** 4/19/2019 7:47:47 PM  
**To:** juanita.bacey@dtsc.ca.gov; Reese, Shane@CDPH [shane.reese@cdph.ca.gov]  
**CC:** Karla Brasaemle [kbrasaemle@techlawinc.com]  
**Subject:** draft comment soil reference background area  
**Attachments:** BRA Site Walk.docx; ATT00001.htm

I suggest we add at the end that we recommend a second offsite reference background area, as discussed during the visit.

we also should ask the Navy to be prepared to have a back up reference background location in case Potential signs of contamination is found at any of the current RBA sites. Paul verbally agreed to backup.

Nina and Shane

You also did the site visit . What other issues can you think of?

Sent from my iPhone

Begin forwarded message:

**From:** "Brasaemle, Karla" <Karla.Brasaemle@TechLawInc.com>  
**Date:** April 19, 2019 at 12:01:41 PM PDT  
**To:** "LEE, LILY" <LEE.LILY@EPA.GOV>  
**Cc:** "Rodriguez, Dante" <Rodriguez.Dante@epa.gov>  
**Subject:** RE: Could you draft a comment on San Bruno site soil reference background area by next Friday 4/19?

Hi Lily,

Here is the requested comment about off-site BRA selection:

The off-site Background Reference Area (BRA) is likely to be moved to another less disturbed site. During the February 11, 2019 site walk it was agreed that this change could be made after the Parcel G Removal Site Evaluation Work Plan (WP) is finalized using the Field Change Request (FCR) process and that this FCR would be submitted to the Regulatory Agencies before sampling of this area is conducted so that Regulatory Agency representatives can be present to observe and collect split samples. Split samples will be collected from approximately 10% of the locations. Also, as discussed during the site walk, it was agreed that the off-site BRA would not be located at or near the bottom of a slope where fallout radionuclides could have been concentrated in run-off and that it would be located in an area that had been undisturbed since the 1940s, based on aerial photograph review and discussion with people familiar with the history of the site. Finally, it is unclear if a second off-site BRA would be selected. Please ensure that the off-site BRA(s) is/are not located at the bottom of a slope and is/in a relatively undisturbed area. Please also ensure that any FCR changing the off-site BRA location is submitted prior to collection of samples at the BRA and that the Regulatory Agencies are notified in time to allow scheduling an observer who will collect split samples. Finally, please ensure that the WP is revised to include detailed procedures for split sampling.

Also, I'm attaching the site-walk write up.

Karla Brasaemle, P.G.,  
TechLaw, Inc.  
415-762-0566

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**From:** LEE, LILY <LEE.LILY@EPA.GOV>  
**Sent:** Thursday, April 11, 2019 9:03 AM  
**To:** Brasaemle, Karla <Karla.Brasaemle@TechLawInc.com>  
**Subject:** Could you draft a comment on San Bruno site soil reference background area by next Friday 4/19?

Dear Karla,

Please draft an EPA comment on Appendix C of the Parcel G Workplan re soil reference background testing that states EPA's position regarding potential alternate soil reference background locations, e.g.

"If the Navy changes the reference background location through a subsequent change order, then that new location must meet these criteria:

- <!--[if !supportLists]--><!--[endif]-->Likely to be undisturbed since the 1940's
- <!--[if !supportLists]--><!--[endif]-->Not at the bottom of a slope, where radionuclides could concentrate
- <!--[if !supportLists]--><!--[endif]-->Etc.

I don't know how specific you think we should get about the location(s) you identified at San Bruno

Lily Lee  
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